

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**FOURTH AMENDED CHARGE
AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 19-CA-296424	Date Filed 8/12/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		b. Tel. No. (206) 318-2212	
		c. Cell No.	
		f. Fax No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134		e. Employer Representative Howard Schultz, CEO	
		g. e-mail hschultz@starbucks.com	
		h. Number of workers employed Approx. 200	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop		j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See Attachments A and B.			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United			
4a. Address (Street and number, city, state, and ZIP code) Workers United 22 South 22 nd St Philadelphia, PA 19103		4b. Tel. No. (646) 448-6414	
		4c. Cell No.	
		4d. Fax No. (215) 575-9065	
		4e. e-mail rminter@pjbwu.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union			
<p align="center">6. DECLARATION</p> <p>I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.</p>  <p>(signature of representative or person making charge)</p> <p align="center">Marina Multhaup, Attorney</p> <p align="center">(Print/type name and title or office, if any)</p> <p>Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400 Address <u>Seattle, WA 98119</u></p>		Tel. No. (206) 257-6001	
		Office, if any, Cell No.	
		Fax No. (206) 378-4132	
		e-mail multhaup@workerlaw.com	
Date <u>8/12/2022</u>			

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

ATTACHMENT A

Within the past six months, on a nationwide basis, Starbucks Corporation (the “Employer”) has failed and refused to bargain with the Union at stores represented by Workers United, including but not limited to all stores listed in Attachment B, by 1) improperly delaying and/or not acknowledging demands to bargain sent by the Union; 2) not providing a single bargaining date to begin negotiations despite repeated requests 3) improperly delaying the furnishing of information; and/or 4) providing unlawfully limited information without a legitimate basis for objection.

The above unlawful behaviors have made it impossible to begin bargaining a contract at all of the stores listed in Attachment B.

The Union requests 10(j) relief in this charge.

ATTACHMENT B

1. Store #29259 located at 620 Northwest Hwy, Cary, IL 60013
2. Store #49134 located at 4712 Cedar Ave, Minneapolis MN 55407
3. Store #65228 located at 300 Snelling Ave Suite C, Saint Paul MN 55105
4. Store #08964 located at 1081 Whitehorse Mercerville Rd, Hamilton Twp, NJ 08610
5. Store #07853 located at 800 A Denow Rd, Pennington, NJ 08534
6. Store #48809 located at 2 Beechwood Rd, Summit, NJ 07901
7. Store #07665 located at 4770 Transit Rd, Depew, NY 14043
8. Store #47843 located at 3186 Sheridan Dr, Amherst, NY 14226
9. Store #47906 located at 61 9th Ave, New York, NY 10011
10. Store #10395 located at 130 E Seneca St, Ithaca, NY 14850
11. Store #11932 located at 402 College Ave Suite 402, Ithaca, NY 14850
12. Store #65187 located at 722 South Meadow Street, Ithaca NY 14850
13. Store #00825 located at 13-25 Astor Pl, New York, NY 10003
14. Store #23267 located at 8973 Bay Pkwy, Brooklyn, NY 11214
15. Store #07307 located at 4301 Merrick Rd, Massapequa, NY 11758
16. Store #22349 located at 2830 Willamette St, Eugene, OR 97405
17. Store #22591 located at 1395 University St, Eugene, OR 97403
18. Store #03367 located at 1115 Valley River Dr, Eugene, OR 97401
19. Store #17920 located at 3110 W 11th Avenue Eugene, Oregon 97402
20. Store #27299 located at 1895 Franklin Blvd, Eugene, OR 97403
21. Store #03409 located at 495 West 7th Avenue, Eugene, OR 97401
22. Store #02975 located at 3003 N Delta Hwy #301, Eugene, OR 97408
23. Store #00469 located at 555 Oak St., Portland, OR 97204
24. Store #50363 located at 525 Grand Ave Portland, OR 97232
25. Store #14045 located at 2880 Powell Blvd., Portland, OR 97202
26. Store #02925 located at 2328 W Burnside St #2, Portland, OR 97210
27. Store #03374 located at 7001 SE Milwaukee Ave, Portland, OR 97202
28. Store #00454 located at 7315 SW Garden Home Rd, Portland, OR 97223
29. Store #17747 located at 12235 N Center Ave, Portland, OR 97217
30. Store #07749 located at 4765 Liberty Avenue Pittsburgh, PA 15224
31. Store #09780 located at 116 Merchant Dr, Knoxville, TN 37912
32. Store #00304 located at 101 Broadway E, Seattle, WA 98102
33. Store #10795 located at 315 Cooper Point Rd. NW Unit 101 Olympia, WA 98502
34. Store #98117 located at 9999 Holman Rd. NW Seattle, WA 98117
35. Store #03281 located at 1600 E Olive Way, Seattle, WA 98102
36. Store #11159 located at 5300 Capitol Blvd SE Tumwater, WA 98501
37. Store #08740 located at 3625 Broadway, Suite A, Everett, WA 98201
38. Store #03448 located at 2344 Eastlake Ave E, Seattle, WA 98102